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**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re: : **CHAPTER 13**
Jeremy R Askew : **CASE NO. 20-17570-MBK**
Lisa J Burke-Askew
DEBTORS : **NOTICE OF MOTION**
: **TO VACATE STAY**
: **HEARING DATE: March 10, 2021**
:

TO: Brad J. Sadek, Esq., Albert Russo, Trustee, Jeremy R Askew and Lisa J Burke-Askew, Debtors.

PLEASE TAKE NOTICE that the undersigned, attorney for the Mortgagee, New Jersey Housing and Mortgage Finance Agency, will apply to the above-named Court at the U.S. Bankruptcy Court House, 402 East State Street, Trenton, New Jersey, in Courtroom #8, on March 10, 2021, at 9:00 a.m., or as soon thereafter as counsel may be heard, for an Order to Vacate the Automatic Stay pursuant to 11 U.S.C. § 362.

This Motion is being submitted under Local Bankruptcy Rule 4001-1. An accompanying brief has not been submitted because Local Rule permits a Secured Creditor to file the instant Motion supported by a Certification attesting to the operative circumstances and the Movant's entitlement to the relief requested.

PLEASE TAKE FURTHER NOTICE that if you contest this Motion, you must appear in Court on the date noted above and you are further required to file with the Court and serve on the undersigned a written response, in accordance with Rules of Court, no later than seven (7) days prior to the hearing date pursuant to Local Bankruptcy Rule 9013-2(a)(2). If a written response is not served and filed, the Court will treat this Motion as uncontested and may not conduct a hearing.

PLUESE, BECKER & SALTZMAN, LLC

BY: /s/ Rob Saltzman
Rob Saltzman, Esquire

DATED: February 12, 2021